

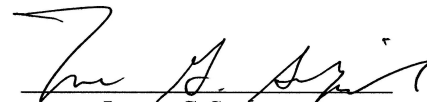
January 13, 2023

The depositions of Nao Yamashita and Maria Vazquez shall be taken on March 9, 2023, and March 21, 2023, respectively. These dates may not be changed without judicial approval. So Ordered.

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Dated: January 17, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Shinano Kenshi Corp. et al. v. Honeywell Int'l Inc.*, Case No. 22 CV 3704 (LGS)

Dear Judge Schofield:

Pursuant to the Court's Orders dated November 14, 2022 and December 15, 2022 (Dkt. Nos. 35, 42), Plaintiffs Shinano Kenshi Corporation and Shinano Kenshi Co., Ltd. (collectively referred to as "Plaintiff") and Defendant Honeywell International Inc. ("Defendant"), respectfully submit this joint letter to the Court regarding the progress of discovery.

I. Depositions

On December 12, 2022, the Court adopted the parties' proposed deposition schedule. (Dkt. No. 39). On December 15, 2022, the Court directed the parties to submit a joint letter regarding the scheduling of the deposition of Maria Vazquez and any further deponents. (Dkt. No. 42). Pursuant to the Court's December 15, 2022 Order (Dkt. No. 42), the parties have agreed to a mutually agreeable date for Ms. Vazquez's deposition and have agreed to conduct the deposition of Nao Yamashita, a current employee of Plaintiff:

Witness	Title	Date
Nao Yamashita	Strategic Accounts & Technologies for Shinano	March 9, 2023
Maria Adriana Vazquez	Former Procurement Ops Leader for Honeywell	March 21, 2023

In addition to the depositions identified above, and in the parties' joint letter (Dkt. No. 38) and incorporated by the Court (Dkt. Nos. 39, 40), the parties reserve the right to take additional depositions to the extent additional relevant personnel are identified while reviewing the document productions or taking the presently scheduled depositions. If additional depositions are necessary, the parties will promptly notify the Court in accordance with the December 15, 2022 Order. (Dkt. No. 42).

II. Document Production

Pursuant to the Court's Amended Scheduling Order (Dkt. No. 35), the parties have substantially completed their document productions on or before the January 6, 2023 deadline. Plaintiff identified one additional custodian and is in the process of reviewing and processing any responsive documents for production. Plaintiff anticipates this production to be complete by January 25, 2023. Defendant identified two additional custodians and is also in the process of reviewing and processing any responsive documents for production. Defendant anticipates these productions to be complete by January 20, 2023. These productions will not delay any of the depositions.

Respectfully Submitted,

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